

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**CERTIFICATE OF NO OBJECTION TO LIQUIDATING TRUSTEE'S
FIFTEENTH OMNIBUS OBJECTION TO CLAIMS (BOOKS AND RECORDS CLAIMS)**

[Related Docket No. 2488]

The undersigned hereby certifies as follows:

1. On May 21, 2021, the *Liquidating Trustee’s Fifteenth Omnibus Objection to Claims (Books and Records Claims)* [Docket No. 2488] (the “Objection”) was filed with the Court by the trustee for the Liquidating GUC Trust (the “Liquidating Trustee”).
 2. Responses, if any, to the Objection were required to have been filed with the Court on or before June 21, 2021 (the “Response Deadline”).
 3. The Response Deadline has passed and no responsive pleading to the Objection has appeared on the Court’s docket in the above-captioned chapter 11 cases or was served upon

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Neiman Marcus Group LTD LLC (9435); Bergdorf Goodman Inc. (5530); Bergdorf Graphics, Inc. (9271); BG Productions, Inc. (3650); Mariposa Borrower, Inc. (9015); Mariposa Intermediate Holdings LLC (5829); NEMA Beverage Corporation (3412); NEMA Beverage Holding Corporation (9264); NEMA Beverage Parent Corporation (9262); NM Bermuda, LLC (2943); NM Financial Services, Inc. (2446); NM Nevada Trust (3700); NMG California Salon LLC (9242); NMG Florida Salon LLC (9269); NMG Global Mobility, Inc. (0664); NMG Notes PropCo LLC (1102); NMG Salon Holdings LLC (5236); NMG Salons LLC (1570); NMG Term Loan PropCo LLC (0786); NMG Texas Salon LLC (0318); NMGP, LLC (1558); The Neiman Marcus Group LLC (9509); The NMG Subsidiary LLC (6074); and Worth Avenue Leasing Company (5996). The Reorganized Debtors' service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201.

the undersigned counsel with respect to the claims listed on **Schedule 1A** and **Schedule 1B** to **Exhibit A**. Further, the Liquidating Trustee has withdrawn the Objection without prejudice as it relates to the claims listed on **Schedule 2** to **Exhibit A**. Accordingly, the undersigned respectfully requests that the form of Order granting the Objection attached hereto as **Exhibit A** be entered at the earliest convenience of the Court.

Dated: June 28, 2021

/s/ Michael D. Warner

Michael D. Warner (TX Bar No. 00792304)
Benjamin L. Wallen (TX Bar No. 24102623)
PACHULSKI STANG ZIEHL & JONES LLP
440 Louisiana Street, Suite 900
Houston, TX 77002
Telephone: (713) 691-9385
Facsimile: (713) 691-9407
Email: mwarner@pszjlaw.com
bwallen@pszjlaw.com

-and-

Justin Bernbrock (admitted *pro hac vice*)
Bryan Uelk (admitted *pro hac vice*)
Robert B. McLellarn (admitted *pro hac vice*)
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
70 West Madison Street, 48th Floor
Chicago, Illinois 60602
Telephone: (312) 499-6300
Facsimile: (312) 499-6301
Email: jbernbrock@sheppardmullin.com
buelk@sheppardmullin.com
rmcellarn@sheppardmullin.com

-and-

Jennifer Nassiri (admitted *pro hac vice*)
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071
Telephone: (213) 617-4106
Facsimile: (213) 443-2739
Email: jnassiri@sheppardmullin.com

-and-

Amanda Cottrell, Esq. (TX Bar No. 24064972)
Steven Gersten, Esq. (TX Bar No. 24087579)
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2200 Ross Avenue, 24th Floor
Dallas, TX 75201
Telephone: (469) 391-7400
Facsimile: (469) 391-7577
Email: acottrell@sheppardmullin.com

*Counsel for the Liquidating GUC Trust and Mohsin Meghji,
in his capacity as trustee of the Liquidating GUC Trust*

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2021, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner
Michael D. Warner